

REMARKS

Claims 1-26 are currently pending in the application. Claims 1, 10, 14 and 22 are independent claims and claims 2-9, 11-13, 15-21, and 23-26, respectively, depend from the independent claims. The Applicants request reconsideration of the claims in light of the following remarks.

On page 2 of the Office Action, claims 1-26 were rejected under 35 U.S.C. § 103(a) as being obvious over Helgeson et al., US Patent 6,643,652, “Helgeson” in view of Adams et al., US Patent 6,457,030, “Adams”. Applicants respectfully traverse the rejections for at least the following reasons.

According to the Office Action, Helgeson discloses all of the features of Applicants’ claim 1 except an application device for applying the transformation rules to the source content that is requested by the content receiving device.

Applicants agree that Helgeson fails to disclose the above-mentioned feature, however Applicants respectfully assert that Helgeson also fails to disclose additional features set forth in independent claim 1. Specifically, Applicants assert that Helgeson also fails to at least disclose the following features which are set forth in claim 1.

According to the Office Action, Helgeson teaches an apparatus for the generation and application of a set of rules to transform source content into result content for a content receiving device, and an analyzer for identifying separate elements within the source content and assigning an identifier to each element from col. 49, line 20 through to col. 50, line 67. The Applicants respectfully disagree.

According to Helgeson’ abstract, Helgeson teaches an apparatus for translating data from a specific local format to a generic interchange format object, and vice versa, with predefined style sheets using generic components. Helgeson teaches a web content server adapted to interact with users regardless of the users hardware platforms locations and software systems (col. 49, lines 19-21). Helgeson teaches generating and executing web links to manage dynamic content generation and dynamic generation of Java script (col. 49, lines 47-49). Helgeson teaches a web content generation engine for use by users to create, render, and present web

content while improving the dynamic acquisition of data from a variety of sources followed by its reformatting and display via style sheets (col. 49, lines 56-59). Helgeson teaches providing users a set of tools, tag and widget libraries, Java classes, and XSL style sheets (col. 50, lines 31-32).

Applicants respectfully assert that Helgeson does not teach generation and application of a set of rules to transform source content into result content for a content receiving device as set forth in Applicants independent claim 1. Helgeson does not teach generating a set of rules for any application. Moreover, Helgeson also does not teach an analyzer for identifying separate elements within the source content and assigning an identifier to each element also as set forth in Applicants independent claim 1.

Further, according to the Office Action, Helgeson teaches a rule generator for generating a set of transformation rules for transforming source content into result content according to respective selective placement in col. 87, lines 31-65. The Applicants respectfully disagree.

Helgeson teaches translating documents between native formats and interchange format using a predefined style sheet (col. 87, lines 35-36). Helgeson teaches extracting objects from the source representation and converting them to an interchange format (col. 87, lines 44-45). Helgeson teaches extracting objects from the source system and collaborating with translators to perform the conversion to interchange format (col. 87, lines 47-48). Helgeson teaches importing objects from interchange format to the target representation (col. 87, lines 55-56) and injecting the objects into the target system (col. 87, lines 59-60) and converting an object or a set of objects into a local format and write them to a source system (col. 87, lines 62-63).

Helgeson does not teach a rule generator for generating a set of transformation rules for transforming source content into result content according to respective selective placement as set forth in Applicants' independent claim 1.

The Applicants respectfully assert that Helgeson at least fails to teach an apparatus for applying transformation rules to source content requested by a content receiving device, an apparatus for generation and application of a set of rules to transform source content into result content for a content receiving device, an analyzer for identifying separate elements within

source content and assigning an identifier to each element, and a rule generator for generating a set of transformation rules for transforming source content into result content according to respective selective placement. Moreover, the Applicants respectfully assert that it is clear that Helgeson does not teach generating a set of rules for any application whatsoever.

For at least the reasons set forth above, the Applicants respectfully assert that Helgeson fails to teach the features of Applicants' independent claim 1. Claim 1 is therefore allowable over Helgeson.

Adams fails to remedy the deficiencies of Helgeson. Adams, even if combineable with Helgeson, fails to teach or suggest an application device for applying transformation rules to source content requested by a content receiving device, an apparatus for generation and application of a set of rules to transform source content into result content for a content receiving device, an analyzer for identifying separate elements within source content and assigning an identifier to each element, and a rule generator for generating a set of transformation rules for transforming source content into result content according to respective selective placement. Additionally, the Applicants respectfully assert that it is clear that the proposed combination of Helgeson and Adams does not teach generating a set of rules for any application whatsoever.

For at least the reasons set forth above, the Applicants respectfully assert that the proposed combination of Helgeson and Adams fails to teach every feature set forth in Applicants' independent claim 1. Therefore, claim 1 is allowable over the proposed combination of references. The Applicants respectfully request that the rejection of claim 1 under 35 U.S.C. § 103(a) over Helgeson and Adams be withdrawn.

Claims 2-9 were also rejected as being obvious over the proposed combination of Helgeson and Adams. However, in light of the above recited deficiencies of the proposed references, alone or combined, with respect to claim 1, Applicants respectfully assert that rejections of claims 2-9 are now moot and that the claims are allowable over the cited references. The Applicants respectfully request that the rejection of claims 2-9 under 35 U.S.C. § 103(a) over Helgeson and Adams also be withdrawn.

Regarding claim 10, beginning at the last three lines of page 3 and continuing through line 7 of page 4, the Office Action suggests that independent claim 10 differs from independent claim 1 in that “a web page editor running on the at least one design station, whereby a source web page is retrieved and the layout of a result web page is formed according to the different device capabilities; and a rule generator associated with the web page editor for generating a set of transform rules to convert the source page to the result page, the transform rules being communicated to the at least one proxy server device, wherein the web enabled devices request information from the at least one web site through the at least one proxy server which applies the transform rules to the requested information” which the Office Action suggests reads on Adams (col. 7, lines 38-67 and figures 1A-2). The Applicants respectfully disagree.

The Applicants respectfully disagree that claim 10 differs from claim 1 merely by the features suggested in the Office Action and asserts that claim 10 should be interpreted based upon its own recited features. However, in response to the proposed rejection of claim 10, Applicants assert that because the proposed combination of Helgeson and Adams fails to disclose every feature set forth in Applicants’ claim 1 (see remarks above), then claim 10, which recites additional and different features (see Office Action) beyond those recited in claim 1, is also allowable over the proposed combination of references.

For at least the reasons presented above, the Applicants assert that Helgeson and Adams, either alone or in combination, fail to disclose each and every feature set forth in independent claim 10. Claim 10 is therefore allowable over the proposed combination of references and Applicants request that the rejection of claim 10 under 35 U.S.C. § 103(a) over Helgeson and Adams be withdrawn.

Claims 11-13 were also rejected as being obvious over the proposed combination of Helgeson and Adams. However, in light of the above recited deficiencies of the proposed combination of references with respect to claim 10, the Applicants assert that rejections of claims 11-13 are now moot and that the claims are allowable over the cited references. The Applicants request that the rejection of claims 11-13 under 35 U.S.C. § 103(a) over Helgeson and Adams be withdrawn.

Regarding claim 14-26, in the paragraph in the middle of page 4, lines 8-9, the Office Action suggests that claim 14-26 are analyzed as previously discussed with respect to claims 1-10 above.

Therefore, for at least the reasons presented above, Applicants respectfully assert that Helgeson and Adams, either alone or in combination, fail to disclose each and every feature set forth in claim 14-26. Claims 14-26 are therefore allowable over the proposed combination of references and Applicants request that the rejection of claims 14-26 under 35 U.S.C. § 103(a) over Helgeson and Adams be withdrawn.



CONCLUSION

Based on at least the foregoing reasoning, the Applicants respectfully submit that the cited references, alone or in the proposed combination, fail to disclose the features of the Applicants' claimed invention. For at least these reasons, the Applicants believe that claims 1-26 are in condition for allowance and requests that the application be passed to issue.

Should the Examiner disagree or have any questions regarding this submission, the Applicants invite the Examiner to telephone the undersigned at (312) 775-8000.

A Notice of Allowability is courteously solicited.

Respectfully submitted,

Dated: May 4, 2004

By: _____

Fredrick T. French III
Reg. No. 52,524

McAndrews, Held & Malloy, Ltd.
500 West Madison Street - Suite 3400
Chicago, Illinois 60661
(312) 775-8000